

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 07-748</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED      <u>2/5/08</u></b>
<b>EDWARD LEE</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>CYNTHIA CHILSOM</b>	<b>:</b>	<b>18 U.S.C. § 924(a)(1)(A) (false statements</b>
<b>TRANEA WHITE</b>	<b>:</b>	<b>to a federal firearms dealer - 3 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 922(g)(1) (possession of a</b>
	<b>:</b>	<b>firearm by a convicted felon - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Colosimo's, Inc., 933 Spring Garden, Philadelphia, PA, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
2. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.
3. The rules and regulations governing FFL holders require that a person seeking to purchase a handgun fill out a Firearm Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form

4473 are true and correct. Question 11(a) of ATF Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she is the actual buyer of the firearm. The ATF Form 4473 contains language warning that “You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.” The Form 4473 also includes a certification by the buyer of the firearm(s) that “I understand that answering ‘yes’ to question 11(a) if I am not the actual buyer of the firearm is a crime punishable as a felony”

4. A person who purchases a firearm for another person and falsely completes the Form 4473 is a “straw purchaser.”

5. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth, to ensure that the person is not prohibited from purchasing a firearm.

6. Convicted felons are persons prohibited by law from buying firearms.

7. Defendant EDWARD LEE was a convicted felon prohibited by law from buying firearms.

8 Defendant TRANEA WHITE arranged for defendant CYNTHIA CHILSOM to illegally purchase a firearm for EDWARD LEE.

9. Following defendant TRANEA WHITE’s direction, defendant CYNTHIA CHILSOM illegally purchased a firearm for defendant EDWARD LEE.

10. Defendant EDWARD LEE paid defendant CYNTHIA CHILSOM to buy a firearm for him, knowing that defendant CHILSOM would assert that she was buying the gun for

herself, although that was not true.

11. On or about February 14, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**EDWARD LEE,  
CYNTHIA CHILSOM and  
TRANEA WHITE,**

in connection with the acquisition of a Taurus Millennium PT 140 Pro 9mm handgun, serial number SZD10089, from Colosimo's, Inc., knowingly made, and aided, abetted, and willfully caused, a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holder's records, in that defendant CYNTHIA CHILSOM certified on the Form 4473 that she was the actual buyer of the firearm, when in fact, as she knew, this statement was false and fictitious.

All in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about February 14, 2007, through October 10, 2007, in Philadelphia,  
in the Eastern District of Pennsylvania, defendant

**EDWARD LEE,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Taurus Millennium PT 140 Pro 9mm handgun, serial number SZD10089, loaded with 10 live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Lou's of Upper Darby, Inc, 2 S. 69<sup>th</sup> Street, Upper Darby, PA, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.

2. Paragraphs 2 through 6 from Count 1 of this Superseding Indictment are incorporated herein.

3. Defendant TRANEA WHITE was a convicted felon prohibited by law from buying firearms.

4. Defendant CYNTHIA CHILSOM illegally purchased a firearm for defendant TRANEA WHITE.

5. Defendant TRANEA WHITE asked defendant CYNTHIA CHILSOM to buy a firearm for her, knowing that defendant CHILSOM would assert that she was buying the gun for herself, although that was not true.

6. On or about April 1, 2006, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**TRANEA WHITE,**

in connection with the acquisition of a Taurus PT 140 .40 caliber handgun, serial number SZA83284, from Lou's of Upper Darby, Inc., knowingly made, and aided, abetted, and willfully caused CYNTHIA CHILSOM to make a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in

the FFL holder's records, in that CYNTHIA CHILSOM certified on the Form 4473 that she was the actual buyer of the firearm, when in fact, as she knew, this statement was false and fictitious.

All in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

## **COUNT FOUR**

### **THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1 through 6 of Count One of this Superseding Indictment, and paragraph 3 of Count Three of this Superseding Indictment, are incorporated herein.

2. Question 11(c) of ATF Form 4473 asks the prospective purchaser to state whether or not they have “ever been convicted in any court of a felony, or any other crime, for which the judge could have imprisoned you for more than one year, even if you received a shorter sentence including probation.” The Form 4473 also includes a certification by the buyer of the firearm(s) that “I understand that a person who answers ‘yes’ to any of the questions 11.b through 11.k is prohibited from purchasing or receiving a firearm. . . I also understand that making any false oral or written statement . . . is a crime punishable as a felony.”

3. On or about February 14, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

### **TRANEA WHITE,**

in connection with the attempted acquisition of a Taurus PT-111 9mm handgun, serial number TZK-43607, from Colosimo’s, Inc., knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holder’s records, in that defendant TRANEA WHITE certified on the Form 4473 that she had never been convicted in any court of a felony, or any other crime, for which the judge could have imprisoned her for more than one year, when in fact, as she knew, this

statement was false and fictitious.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).



**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 924(a)(1)(A), and 922(g)(1), set forth in this indictment, defendants

**EDWARD LEE  
CYNTHIA CHILSOM and  
TRANEA WHITE**

shall forfeit to the United States of America the firearms involved in the commission of such offenses, including, but not limited to:

- (1) 1 Taurus Millennium PT 140 Pro 9mm handgun, serial number SZD10089, and 10 live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**